

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Court File No. CR-21-93 (JRT/TNL)

United States of America,
Plaintiff,

v.

Robbin Allen Thomas,
Defendant.

**Motion for Disclosure of Rule 404
Evidence**

Defendant Robbin Allen Thomas hereby moves the Court for an order directing the Government to disclose any “bad act” or “similar course of conduct” evidence it intends to offer at trial pursuant to Fed. R. Evid. 404 and to identify any witnesses or exhibits it intends to offer. The grounds for the motion are:

- 1) Early disclosure would prevent surprise and delay at trial;
- 2) Early disclosure would allow Defendant’s counsel to adequately prepare to address and respond to such evidence at trial;
- 3) Early disclosure would allow Defendant the opportunity to timely seek exclusion of any prejudicial, irrelevant, or otherwise inadmissible evidence;
and
- 4) The government should not be permitted to evidence of prior crimes, wrongs or bad acts which it intends to introduce during its case in chief.

This motion is based upon the files, records, and proceedings in this case and such additional arguments and authorities as may be submitted.

Respectfully submitted,

Dated: September 8, 2021

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